

2. Because the Stay Order and Injunction prohibits the filing of new cases on the terms set forth therein, the Parties request a modification providing that any statutes of limitations or repose for any Claims that a Releasing Person is enjoined from filing by Section VIII of the Order Granting Preliminary Approval shall be tolled during the pendency of such Stay Order and Injunction.

3. Attached hereto is a redline showing the proposed amendments to Section VIII of the Order Granting Preliminary Approval as set forth above. Proposed Class Counsel and the Settling Defendant respectfully request that the Court enter an amendment to the Order Granting Preliminary Approval incorporating the changes in the attached redline.

Dated: September 18, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 18th day of September, 2023 and was thus served electronically upon counsel of record.

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